

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In re Thomas J. Daniels, and,
Donna J. Daniels

Debtors

Chapter 13

Case No.: 2016-26037-SVK-13

OBJECTION TO MOTION FOR RELIEF FROM AUTOMATIC STAY

James and Audrey Methu have filed an objection to the Motion For Relief From Automatic Stay in this bankruptcy case.

Your claim may be reduced, modified or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one.

NOW COME the above-named debtors, Thomas and Donna Daniels, by and through their Attorneys, MILLER & MILLER LAW, LLC, and by Attorney Krysta Kerr, hereby objects to the Motion for Relief from Automatic Stay of U.S. Bank Trust National Association. As grounds for such objection and requests, the debtor asserts as follows:

1. The Debtors will submit between \$10,000 and \$20,000 prior to the hearing date.
2. Debtors request that any remaining arrearage be filed as a supplemental claim.
3. The Debtors will amend their plan to include any arrears owed to U.S. Bank Trust National Association.

WHEREFORE, the Debtor requests that the Court deny U.S. Bank Trust National Association's Motion to Lift the Automatic Stay and further request that this matter be set for a hearing.

Dated at Milwaukee, Wisconsin this 13th day of November, 2018.

/s/
Krysta Kerr
MILLER & MILLER LAW, LLC
Attorney for Debtor

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CERTIFICATE OF MAILING